

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

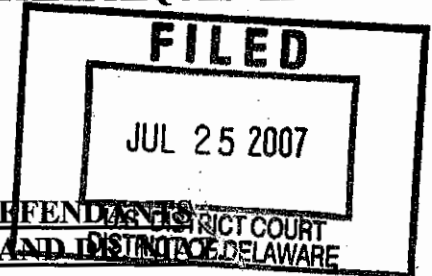
WILLIAM J. WEBB JR.,
Plaintiff,

v.

**FIRST CORRECTIONAL MEDICAL,
ET. AL.,**
Defendants.

CIV. ACT. NO. 07-31-GMS

JURY TRIAL REQUESTED



PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANTS
CORRECTIONAL MEDICAL SERVICES, GINA WOLKEN, AND DR. NIAZ
(Pursuant to Rule 33 Fed. R. of Civ. Proc.)

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Plaintiff requests that defendants Correction Medical Services ("CMS"), Gina Wolken ("Wolken"), and Dr. Niaz ("Niaz") in their respectively named order answer the following interrogatories under oath and serve them on Plaintiff within 30 days pursuant to Rule 33 Fed. R. of Civ. Proc.:

Questions for CMS:

1. Is CMS, FIRST CORRECTIONAL MEDICAL ("FCM"), and PRISON HEALTH SERVICES ("PHS") corporate affiliated? a. If so, what is the parent corporation's name?
b. What is there address? c. Any other known information that can be produced.
2. How many lawsuits within the past ten years have been placed against CMS within the State of Delaware if any? If the answer is yes please state: a. Name of the Court and address; b. Caption in that Court; c. Names and addresses of Plaintiffs and Defendants; d. Disposition of the case(s) and any outcomes with awards; e. Any discoveries that were made.
3. Did CMS sign a \$25,000,000 open bid contract with the Delaware Department of Corrections to provide health care for inmates under their care? If so, a copy of the following: a. Copy of the contract; b. Copy of the check(s) paid for services; c. Copy of how the services were to be provided by any types of protocol(s) or written directives; d.

Any and all other paperwork that is associated with CMS and Delaware Department of Corrections.

4. How many times has CMS been the health care medical provider for the Delaware Department of Corrections? If the answer is yes, state the following: a. Specific dates and times; b. Specific reasons for termination or reason(s) of release of contract(s), and why the contracts were not renewed; c. Copies of the contracts; d. Specific names of all the Staff hired while CMS was the medical provider, and whether the Staff was the same Staff from the previous medical provider that had been hired by the Delaware Department of Corrections; and e. Any Staff that was fired, suspended, or relieved of their contract and the reasons for such actions.
5. How long has the Plaintiff, William J. Webb Jr. been on the chronic care list since CMS has been the health care medical provider?
6. How many times has the Plaintiff William J. Webb Jr. been admitted to the hospital at D.C.C. while CMS was the health care medical provider for the Delaware Department of Corrections? If the answer is yes, please state the following? a. List the dates and times of admission(s); b. The Staff that was on duty with a picture; c. The Doctor(s) that were on call at the time(s) of admission(s); d. The length of time and reason for admission with all of the medications and services provided; e. Any and all other notes, or other performances that were or may have been made.
7. Specifically what was Dr. Niaz hired to do while employed with CMS?
8. Does Dr. Niaz still work for CMS? If yes, state where. If no, state the reasons for any departure and any written complaints filed by anyone.
9. Specifically what was Gina Wolken hired to do while employed with CMS?
10. Does Gina Wolken still work for CMS? If yes, state where and what she is employed as. If no, state the reasons for any departure and any written complaints filed by anyone.

11. Can CMS make recommendations to the Delaware Department of Corrections to have inmates released early due to severe medical issues? If so, give all necessary information.
12. How many inmates within the past 10 years have staff for CMS misdiagnosed their illnesses? If the answer is yes, state the following: a. Was CMS sued?; b. What were the misdiagnosis's illnesses; c. State any and all information that is in connection with this question.
13. What is the protocol for Hepatitis C treatments and procedures leading to treatments that CMS implements?
14. What is the protocol for treating Cellulitis (inflammation of the skin) and procedures for further prevention that CMS implements?
15. Why was the Plaintiff denied Tylenol or any other fever medication when He had a fever of 102.1° until it reached 104+°?
16. Why was the Plaintiff denied ice for His right leg when it was bright red and hotter than His body temperature was?
17. Why would a nurse put a heat pack on a leg that's temperature is higher than the body temperature?
18. Who were the nurses on duty on February 20, 2005?
19. Who was or were the Doctors on call February 20, 2005?
20. Who were the nurse(s) assigned to work with Dr. Niaz?
21. Who were the nurses on duty between the dates of February 21, 2005 until February 26, 2005?
22. Where the Plaintiff was admitted into the hospital where CMS is the health care medical provider, isn't that considered to be in "your care?"
23. Isn't it against CMS policy to pay for attorney fees for their employees?

Answer Space for CMS:

1. (ANSWER)

2. (ANSWER)

3. (ANSWER)

4. (ANSWER)

5. (ANSWER)

6. (ANSWER)

7. (ANSWER)

8. (ANSWER)

9. (ANSWER)

10. (ANSWER)

11. (ANSWER)

12. (ANSWER)

13. (ANSWER)

14. (ANSWER)

15. (ANSWER)

16. (ANSWER)

17. (ANSWER)

18. (ANSWER)

19. (ANSWER)

20. (ANSWER)

21. (ANSWER)

22. (ANSWER)

23. (ANSWER)

Questions for Dr. Niaz:

1. What degree of school did you complete? If so, give all schools and achievements obtained.
2. Do you have a private practice? If so, give the address and type of insurance.
3. Did you try to administer Interferon shots to the Plaintiff on April 19, 2006 without following the protocol of having a liver biopsy completed, H.I.V./A.I.D.S. test completed, and a mental health evaluation? If yes, explain why? If no, explain why the Plaintiff had to ask about what was going on and the nurse handed Him a CMS education/information package about Hepatitis C.
4. How many times did you see Plaintiff? If yes, explain the nature of the visit and what occurred at the appointments.
5. What is the protocol that you are to use once a patient is diagnosed with Hepatitis C before and during any treatments administered?
6. What type of Specialties do you specialize in within the medical field?
7. Have you ever had any type of complaints filed against you in any shape or form? If yes, give a specific description as to each complaint filed whether with any type of board, employer, court, etc..., along with the name and address, the type of proceeding, the outcome of the proceeding, and any awards.
8. How many visits do you have with patients diagnosed with Hepatitis C?
9. Did you or didn't you stop seeing the Plaintiff after He filed a medical grievance against you for how you were handling His Hepatitis C diagnosis?
10. Are you still employed by CMS? If yes, state where. If no, state the specific reasons for any departure.
11. Were you an employee of First Correctional Medical while they were the health care medical provider at DCC?

Answer space for Dr. Niaz:

1. (ANSWER)

2. (ANSWER)

3. (ANSWER)

4. (ANSWER)

5. (ANSWER)

6. (ANSWER)

7. (ANSWER)

8. (ANSWER)

9. (ANSWER)

10. (ANSWER)

11. (ANSWER)

Questions for Gina Wolken:

1. What degree of schooling have you completed? Give the name and location with completions obtained.
2. Do you work for CMS? If yes, state where. If no, state the specific reasons for any departure.
3. Did you or did you no in the month of June 2005 complete a grievance hearing on behalf of the applicable medical provider at D.C.C. state to the Plaintiff that on March 4, 2005, the doctor that ordered His ultrasounds to be completed denied them on the same day?
4. How come you did not schedule the doctor's appointment that you told Plaintiff that you were going to schedule?
5. What exactly was your employment description for either CMS OR FCM in their perspective names?
6. Were you given any orders in connection with Plaintiff to deny Him medical attention?

Answer Space for Gina Wolken:

1. (ANSWER)

2. (ANSWER)

3. (ANSWER)

4. (ANSWER)

5. (ANSWER)

6. (ANSWER)

Submitted on this 23rd day of July, 2007.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "William Joseph Webb Jr.", written in dark ink.

William Joseph Webb Jr.

#256056 / D/E F17T

1181 Paddock Road

Smyrna, DE 19977

Certificate of Service

I, William J. Webb Jr., hereby certify that I have served a true

And correct cop(ies) of the attached: First Set of Interrogatories

_____ upon the following
parties/person (s):

TO: Eileen Kelly
820 W. French St.
Wilm., DE 19801

TO: First Correctional Medical
6801 N. Oracle Road
Tucson, AZ
85704

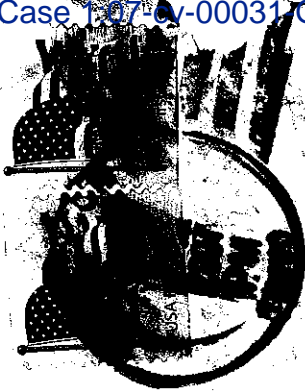
TO: Patrick G. Rock
913 N. Market St.
Wilm., DE 19801

TO: Dr. Al:
1181 Paddock Road
Smyrna, DE 19977

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 23 day of July, 2007

William J. Webb Jr.



IM William J. Webb Jr.
SBI# 256056 UNIT D/E F177

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

MAILED
JUN 25 2007

Clerk of the U.S. Dist. Ct.

844 King St, Lock box 18

Wilmington DE

19801